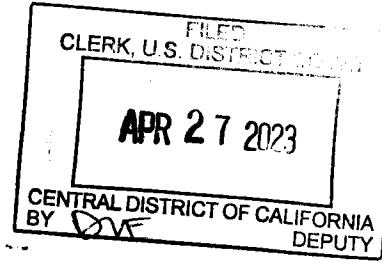


1 John W. Sigler
2 13129 Stern Ave
La Mirada, California 90638
3 Telephone: (714) 697-8576
Email: JSIGLER@SWS-LLC.COM

4 ***Plaintiff In Propria Persona***



6 **UNITED STATES DISTRICT COURT**
7 **CENTRAL DISTRICT OF CALIFORNIA**

8 JOHN W. SIGLER,

9 Case No. 8:22-cv-2325-CJC-JDE

10 Plaintiff,

11 vs.

12 Jorge Gonzalez, USAA Casualty
13 Insurance Company, Interinsurance
14 Exchange of Automobile Club of
15 Southern California, Imperial Body
16 Shop, Inc., and DOEs 1 to 99,
17 inclusive;

18 **DECLARATION IN
SUPPORT OF
REQUEST FOR
ENTRY OF DEFAULT**

19 Defendants.

20
21 I, John W. Sigler, declare under penalty of perjury that the following facts are
22 true and correct to the best of my information and belief:

- 23
24 1. I am the Plaintiff serving In Propria Persona in this action.
25 2. On March 22, 2023, I had a copy of the original Summons and
26 Complaint served on Defendant Jorge Gonzalez's attorney at the offices of
27 Ford, Walker, Haggerty, and Behar located in Long Beach, CA. A copy of the
28

Plaintiff John W. Sigler:

DECLARATION IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT BY THE CLERK

1 Proof of Service is attached as **Exhibit A**; and was filed with the Superior
2 Court of California on March 31, 2023, who issued the original Summons.

3 3. An informational copy of the Proof of Service was filed with the
4 Federal Court on March 31, 2023 as Document 27.

5 4. The Complaint was originally filed with the California Superior court
6 on November 18, 2022.

7 5. On December 29, 2023, said Complaint was removed to Federal Court
8 by the Defendants as shown in Document 1 contained in the Federal Court
9 Records.

10 6. Since I had Mr. Gonzalez served through his attorney on March 22,
11 2023, it is my position that according to FRCP Rule 12 and Rule 81, Mr.
12 Gonzalez was required to respond to the complaint by April 13, 2023 or be in
13 default as of April 14, 2023.

14 7. I was legally allowed to serve Mr. Gonzalez through his attorneys
15 because on March 17, 2023 at 3:31 pm I received the email contained in
16 **Exhibit B** from Defendant's attorney Eran Forster; within which Mr. Forster
17 stated that the law firm of Ford, Walker, Haggerty and Behar were representing
18 Defendant Jorge Gonzalez and legal documents were to be served on their law
19 firm, which justified my March 22, 2023 service of the Complaint and
20 Summons on Mr. Gonzalez's attorneys.

21 8. Prior to receiving the email shown in **Exhibit B**, and due to Mr.
22 Gonzalez avoiding earlier attempts at personal service, on March 17, 2023 at
23 10:08am I mailed a Request to Waive Service of Summons to the last known
24 address of Mr. Gonzalez, five hours before receiving the confirmation email of
25 **Exhibit B** that Mr. Gonzalez had retained an attorney.

26 9. **Exhibit C** contains a copy of the Request to Waive and the Waiver
27 mailed to Mr. Gonzalez on March 17, 2023.

1 10. **Exhibit D** contains a photo of all the documents included in the
2 mailing to Mr. Gonzalez, as well as the USPS label with the tracking number.

3 11. **Exhibit E** contains a copy of the USPS tracking information showing
4 the package was delivered to Mr. Gonzalez on March 18, 2023.

5 12. Within the Request to Waive Service of Summons, I informed Mr.
6 Gonzalez that he must return the signed waiver within 30 days of the mailing
7 date of March 17, 2023; making the deadline of returning the waiver April 17,
8 2023.

9 13. Mr. Gonzalez and his attorneys failed TO TIMELY RETURN a signed
10 copy of my Waiver which was sent on March 17, 2023, so no Waiver of
11 Summons issued by me is in effect or valid.

12 14. On April 24, 2023, I received an email notification from Defendant's
13 attorney Eran Forster (shown in **Exhibit F**) that Mr. Forster had filed on April
14 23, 2023 with the Federal Court a Waiver of Service of Summons. A copy of
15 said Waiver created and filed by Defendant's attorney is included in **Exhibit**
16 **G**.

17 15. The Waiver of Service of Summons filed by Mr. Forster is a fraudulent
18 document and is not valid. The document falsely lists the sent date as March
19 22, 2023, and states that Mr. Forster signed the document on the same date it
20 was sent. I sent my version of a Waiver to Mr. Gonzalez on March 17, 2023 as
21 previously proven, and since Mr. Forster resides in Nevada and I live in
22 California it would be impossible for any Waiver to be sent and signed for on
23 the same day.

24 16. The fraudulent Waiver filed by Mr. Forster falsely states the "Date
25 Notice of Lawsuit and Request for Waiver of Service Summons is Sent" was
26 March 22, 2023. This date has no connection whatsoever with the Request for
27 Waiver package I mailed to Mr. Gonzalez.

1 17. The date on the original Waiver's sent to Mr. Gonzalez, which Mr.
2 Gonzalez never signed was March 17, 2023 as shown by **Exhibits C, D, and**
3 **E.**

4 18. The only correlations I could find with the date of March 22, 2023 was
5 that 1) March 22, 2023 was the date that the defendant's attorneys were legally
6 served the actual Summons and Complaint, so the Waiver's acceptance date
7 had to on or before March 22, 2023 to claim it was valid, and 2) the Waiver
8 had to be returned to me within 30 days to be valid, so since the waiver was
9 filed with the Court on April 23, 2023, claiming the Waiver was signed or sent
10 any earlier than March 22, 2023 would make it invalid since it was not
11 returned within 30 days.

12 19. My evaluation of the physical evidence indicates to me that the Wavier
13 filed with the court as document 30 was filed with the sole intent to defraud me
14 and the court by claiming a valid Waiver exists when one does not, and
15 fraudulently claim Mr. Gonzalez is not in default.

16 20. NO VALID WAIVER EXISTS. I had Mr. Gonzalez legally served on
17 March 22, 2023, and Mr. Gonzalez has been in default since April 14, 2023.

18
19 Executed on March 26, 2023 at La Mirada, California.

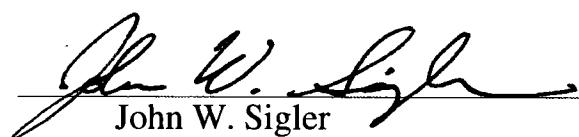
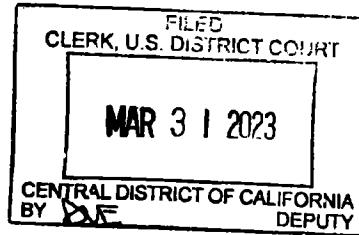
20
21
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23 
24 John W. Sigler
25 *Plaintiff in Propria Persona*
26
27
28

EXHIBIT A

Proof of Service of Summons and Complaint on Mr. Gonzalez's attorneys on March 22, 2023.

**Plaintiff John W. Sigler:
DECLARATION IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT BY THE CLERK**

1 John W. Sigler
2 13129 Stern Ave
3 La Mirada, California 90638
4 Telephone: (714) 697-8576
Email: JSIGLER@SWS-LLC.COM
Plaintiff In Propria Persona



7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**

9 JOHN W. SIGLER,

10 Case No. **8:22-cv-2325-CJC-JDE**

11 Plaintiff,

12 vs.

13 Jorge Gonzalez, USAA Casualty
14 Insurance Company, Interinsurance
15 Exchange of Automobile Club of
16 Southern California, Imperial Body
17 Shop, Inc., and DOEs 1 to 99,
18 inclusive;

19 Defendants.
20

**Filing in Federal System of
Original Superior Court of
California**

**Proof of Service
For Defendant**

Jorge Gonzalez

Judge: Cormac J. Carney

23 Attached is a copy of the original proof of service for the Summons and Complaint
24 filed in the Superior Court of California for inclusion in the Federal Court records.
25
26
27
28

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address). John W. Sigler - Plaintiff in Propria Persona 13129 Stern Ave. La Mirada, CA 90636		FOR COURT USE ONLY FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF ORANGE CENTRAL JUSTICE CENTER MAR 24 2023 DAVID H. YAMASAKI, Clerk of the Court BY: _____ DEPUTY
TELEPHONE NO.: 714-697-8576	FAX NO. (Optional):	
E-MAIL ADDRESS (Optional): JSIGLER@SWS-LLC.COM		
ATTORNEY FOR (Name): John Sigler, Plaintiff in Propria Persona		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS 700 Civic Center Drive MAILING ADDRESS:		
CITY AND ZIP CODE: Santa Ana, CA 92701 BRANCH NAME: Central Justice Center		
PLAINTIFF/PETITIONER: John W. Sigler		CASE NUMBER
DEFENDANT/RESPONDENT: Gonzalez, USAA, Interinsurance Exchange of Auto Club, et al.		30-2022-01292291
PROOF OF SERVICE OF SUMMONS		Ref. No. or File No.:

(Separate proof of service is required for each party served.)

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - a. summons
 - b. complaint
 - c. Alternative Dispute Resolution (ADR) package
 - d. Civil Case Cover Sheet (*served in complex cases only*)
 - e. cross-complaint
 - f. other (*specify documents*):
3. a. Party served (*specify name of party as shown on documents served*):
Jorge Gonzalez
 b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (*specify name and relationship to the party named in item 3a*):
Rocio Baptista - Litigation Secretary at Ford, Walker, Haggerty & Behar, the law firm representing Mr. Gonzalez.
4. Address where the party was served:
One World Trade Center, 27th Floor, Long Beach, CA 90831
5. I served the party (*check proper box*)
 - a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): March 22, 2023 (2) at (time): 11:10 am
 - b. by substituted service. On (date): at (time): I left the documents listed in item 2 with or in the presence of (*name and title or relationship to person indicated in item 3*):
 - (1) (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
 - (2) (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
 - (3) (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
 - (4) I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., § 415.20). I mailed the documents on (date): from (city): or a declaration of mailing is attached.
 - (5) I attach a declaration of diligence stating actions taken first to attempt personal service.

Page 1 of 2

POS-010

PLAINTIFF/PETITIONER: John W. Sigler	CASE NUMBER:
DEFENDANT/RESPONDENT: Gonzalez, USAA, Interinsurance Exchange of Auto Club, et al.	

5. c. by mail and acknowledgment of receipt of service. I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date):
(2) from (city):
- (3) with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed Notice and Acknowledgment of Receipt.) (Code Civ. Proc., § 415.30.)
- (4) to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. by other means (specify means of service and authorizing code section):

Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. as an individual defendant.
b. as the person sued under the fictitious name of (specify):
c. as occupant.
d. On behalf of (specify):

under the following Code of Civil Procedure section:

- | | |
|---|---|
| <input type="checkbox"/> 416.10 (corporation) | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation) | <input type="checkbox"/> 416.60 (minor) |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee) |
| <input type="checkbox"/> 416.40 (association or partnership) | <input type="checkbox"/> 416.90 (authorized person) |
| <input type="checkbox"/> 416.50 (public entity) | <input type="checkbox"/> 415.46 (occupant) |
| | <input type="checkbox"/> other: |

7. Person who served papers

- a. Name: Anhthu Nguyen
b. Address: 13129 Stern Ave., La Mirada, CA 90638
c. Telephone number: 714-697-8520
d. The fee for service was: \$ \$150.00
e. I am:
(1) not a registered California process server.
(2) exempt from registration under Business and Professions Code section 22350(b).
(3) a registered California process server:
(i) owner employee independent contractor.
(ii) Registration No.:
(iii) County:

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
or

9. I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date:

Anhthu Nguyen

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)


(SIGNATURE)

EXHIBIT B

Email from Defendant's attorney Eran Forster on March 17, 2023 stating that his law firm was representing Mr. Gonzalez and legal document were to be served on them.

John Sigler

From: Eran Forster [eforster@fwhb.com]
Sent: Friday, March 17, 2023 3:31 PM
To: John Sigler; Jeet Sen
Cc: Rocio Baptist
Subject: RE: Sigler v. Gonzalez, et al. - Motion to Compel

Hi John,

We can discuss further Monday or Tuesday afternoon of next week. Otherwise, I have 10:00am on both Thursday and Friday available (23rd and 24th). Please let me know if you are available. A telephone call is sufficient but we can also do zoom if you prefer. Our position is that we are in full compliance. We are also permitted to have all legal documents go through our firm that are directed towards our client, Mr. Gonzalez.

Ms. Peterson is being disclosed as a potential witness in her capacity as the adjuster for the Interinsurance Exchange of the Automobile Club. All requests to the Interinsurance Exchange of the Automobile Club must go through Ford, Walker, Haggerty & Behar. We are their attorneys of record. Furthermore, Ms. Peterson's personal information is protected is protected under employee privacy laws.

Please let me know when you are available to discuss further so we can resolve any outstanding issues. Thank you.

Eran Forster

Eran S. Forster, Esq.

Licensed in California & Nevada

www.fwhb.com

From: John Sigler <jsigler@sws-llc.com>
Sent: Friday, March 17, 2023 2:54 PM
To: Jeet Sen <jsen@fwhb.com>
Cc: Eran Forster <eforster@fwhb.com>; Rocio Baptist <rbaptist@fwhb.com>
Subject: RE: Sigler v. Gonzalez, et al. - Motion to Compel

Dear Mr. Sen,

Please see attached letter regarding your client's failure to comply with Local Rule 26f. I intend to file a motion to compel and you need to meet in my office.

Regards,

John Sigler
13129 Stern Ave.
La Mirada, CA 90638
Cell No. (714) 697-8576

EXHIBIT C

Request to Waive Service of Summons and Wavier of the Service of Summons mailed to Mr. Gonzalez on March 17, 2023.

UNITED STATES DISTRICT COURT

For the
Central District of California

Civil Action No. 8:22-cv-2325-CJC-JDE

To: Jorge Gonzalez
427 N. McClay St.
Santa Ana, CA 92701

From: John W. Sigler
13129 Stern Ave
La Mirada, CA 90638

REQUEST TO WAIVE SERVICE OF SUMMONS

WHY ARE YOU GETTING THIS?

A lawsuit has been filed against you in this court under the number shown above. A copy of the complaint is attached: *Note: The origin complaint was filed in California Superior Court, but one of the other Defendants removed the complaint to Federal Court which is why these forms now reference the US. Federal Court.*

This is not a summons, or an official notice from the court. It is a request that, **to avoid expenses**, you waive formal service of a summons by signing and returning the enclosed waiver. **To avoid these expenses**, you must return the signed waiver **within 30 days** from the date shown below, which is the date this notice was sent.

Two copies of the waiver form are enclosed, along with a stamped, self-addressed envelope for returning one copy. If you agree to waive service of the summons, you must sign the enclosed Waiver and return it using the self-addressed stamped Envelope You may keep the extra copy of the Waiver.

WHAT HAPPENS NEXT?

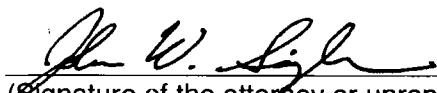
If you return the signed waiver, I will file it with the court. The action will then proceed as if you had been served on the date the waiver is filed, but no summons will be served on you and you will have 60 days from the date this notice is sent (see the date below) to answer the complaint.

If you do not return the signed Waiver within the time indicated, I will arrange to have the summons and complaint served on you. As stated in the "Duty to Avoid Unnecessary Expense" statement on the bottom section of the Waiver, I will ask the court to require you to pay all expenses of making service.

Please read the enclosed statement about the duty to avoid unnecessary expenses.

I certify that this request is being sent to you on the date below.

Date: March 17, 2023



Signature of the attorney or unrepresented party

John W. Sigler
13129 Stern Ave.
La Mirada, CA 90638
jsigler@SWS-LLC.com
714-697-8576

UNITED STATES DISTRICT COURT
for the
Central District of California

John W. Sigler _____)
Plaintiff _____)
v. _____) Civil Action No. 8:22-cv-2325-CJC-JDE
Jorge Gonzalez, et. al. _____)
Defendant _____)

WAIVER OF THE SERVICE OF SUMMONS

To: Jorge Gonzalez
(Name of the plaintiff's attorney or unrepresented plaintiff)

I have received your request to waive service of a summons in this action along with a copy of the complaint, two copies of this waiver form, and a prepaid means of returning one signed copy of the form to you.

I, or the entity I represent, agree to save the expense of serving a summons and complaint in this case.

I understand that I, or the entity I represent, will keep all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a summons or of service.

I also understand that I, or the entity I represent, must file and serve an answer or a motion under Rule 12 within 60 days from 03/17/2023, the date when this request was sent (or 90 days if it was sent outside the United States). If I fail to do so, a default judgment will be entered against me or the entity I represent.

Date: _____

Signature of the attorney or unrepresented party

Printed name of party waiving service of summons

Printed name

Address

E-mail address

Telephone number

Duty to Avoid Unnecessary Expenses of Serving a Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain defendants to cooperate in saving unnecessary expenses of serving a summons and complaint. A defendant who is located in the United States and who fails to return a signed waiver of service requested by a plaintiff located in the United States will be required to pay the expenses of service, unless the defendant shows good cause for the failure.

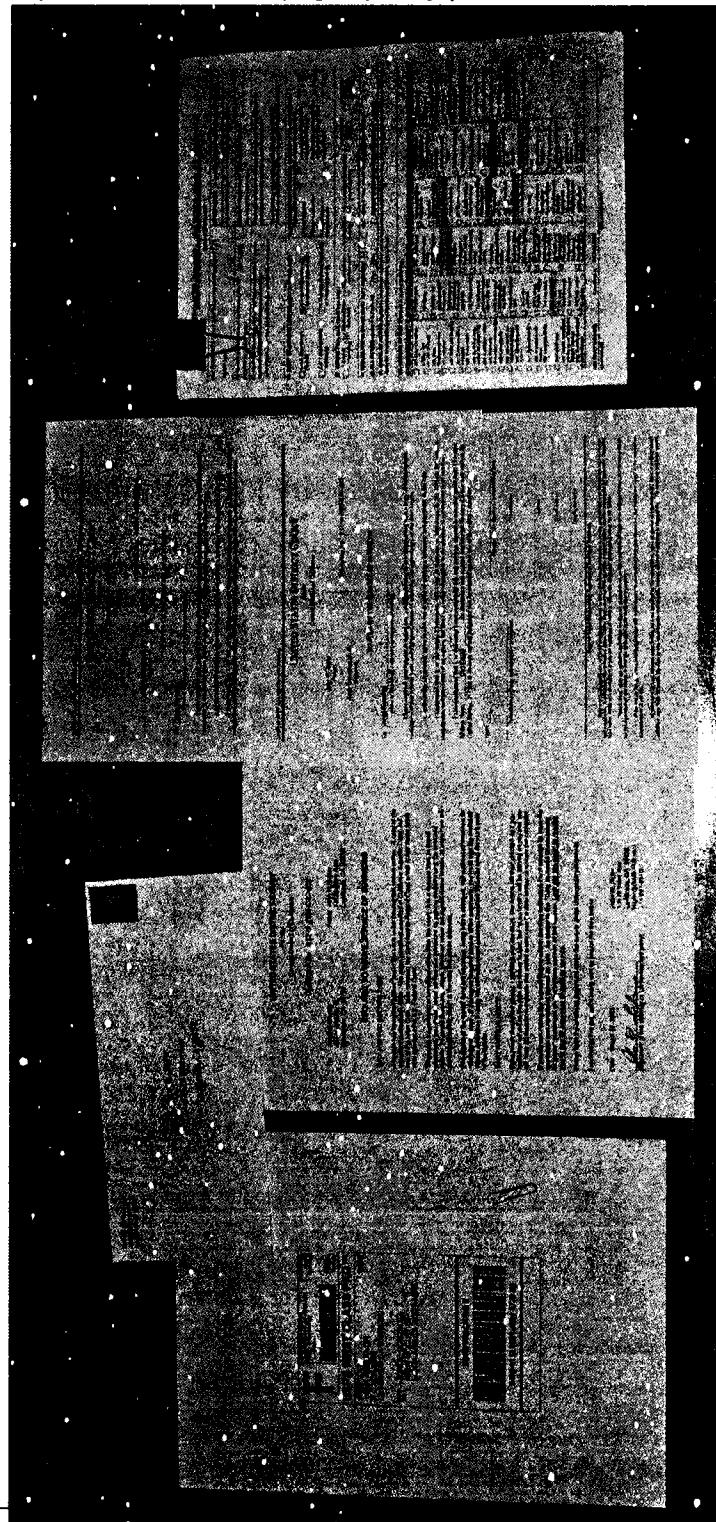
"Good cause" does *not* include a belief that the lawsuit is groundless, or that it has been brought in an improper venue, or that the court has no jurisdiction over this matter or over the defendant or the defendant's property.

If the waiver is signed and returned, you can still make these and all other defenses and objections, but you cannot object to the absence of a summons or of service.

If you waive service, then you must, within the time specified on the waiver form, serve an answer or a motion under Rule 12 on the plaintiff and file a copy with the court. By signing and returning the waiver form, you are allowed more time to respond than if a summons had been served.

EXHIBIT D

Photograph of all paperwork mailed to Mr. Gonzalez on March 17, 2023, including the USPS label with tracking number shown. (high quality photo available if required)



Plaintiff John W. Sigler:

DECLARATION IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT BY THE CLERK

1
2 **EXHIBIT E**
3
4 USPS tracking information for Waiver paperwork mailed to Mr. Gonzalez.
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USPS Tracking®

[FAQs >](#)**Tracking Number:**[Remove X](#)**9400111206214954577509**[Copy](#)[Add to Informed Delivery \(https://informeddelivery.usps.com/\)](https://informeddelivery.usps.com/)

Latest Update

Your item was delivered in or at the mailbox at 12:42 pm on March 18, 2023 in SANTA ANA, CA 92701.

Get More Out of USPS Tracking:

[USPS Tracking Plus®](#)[Feedback](#)

Delivered

Delivered, In/At Mailbox

SANTA ANA, CA 92701
March 18, 2023, 12:42 pm

Out for Delivery

SANTA ANA, CA 92701
March 18, 2023, 8:40 am

Arrived at Post Office

SANTA ANA, CA 92711
March 18, 2023, 8:29 am

Arrived at USPS Facility

SANTA ANA, CA 92711
March 18, 2023, 5:25 am

Departed USPS Regional Facility

SANTA ANA CA DISTRIBUTION CENTER
March 18, 2023, 4:21 am

Arrived at USPS Regional Facility

SANTA ANA CA DISTRIBUTION CENTER

March 18, 2023, 3:46 am

Departed USPS Regional Facility

ANAHEIM CA DISTRIBUTION CENTER

March 18, 2023, 3:01 am

Arrived at USPS Regional Facility

ANAHEIM CA DISTRIBUTION CENTER

March 17, 2023, 9:28 pm

Departed USPS Regional Facility

CITY OF INDUSTRY CA DISTRIBUTION CENTER

March 17, 2023, 8:37 pm

Arrived at USPS Regional Facility

CITY OF INDUSTRY CA DISTRIBUTION CENTER

March 17, 2023, 4:47 pm

USPS in possession of item

LA MIRADA, CA 90638

March 17, 2023, 10:08 am

[Hide Tracking History](#)

Feedback

Text & Email Updates



USPS Tracking Plus®



Product Information



[See Less ▲](#)

[Track Another Package](#)

Enter tracking or barcode numbers

EXHIBIT F

Email received from Defendant's attorney Eran Forster, containing pdf file of fraudulent Waiver submitted to the Court.

John Sigler

From: Eran Forster [eforster@fwhb.com]
Sent: Monday, April 24, 2023 12:04 AM
To: John Sigler
Cc: Rocio Eaptist; Angela Wood
Subject: FW: Activity in Case 8:22-cv-02325-CJC-JDE John W. Sigler v. Jorge Gonzalez et al Waiver of Service Executed
Attachments: K_USDC Forms_Mai Ver_WordPerfect_CV-108.pdf

Mr. Sigler,

I filed a waiver of summons and service for the complaint you served for Mr. Gonzalez to our office. As agreed, we accepted service and I notified the Federal court that service was on 3/22/23. I'll have a response filed shortly. Thanks.

Eran

Eran S. Forster, Esq.

Licensed in California & Nevada

www.fwhb.com

From: cacd_ecfmail@cacd.uscourts.gov <cacd_ecfmail@cacd.uscourts.gov>
Sent: Sunday, April 23, 2023 11:57 PM
To: ecfnef@cacd.uscourts.gov
Subject: Activity in Case 8:22-cv-02325-CJC-JDE John W. Sigler v. Jorge Gonzalez et al Waiver of Service Executed

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Notice of Electronic Filing

The following transaction was entered by Forster, Eran on 4/23/2023 at 11:56 PM PDT and filed on 4/23/2023

Case Name: John W. Sigler v. Jorge Gonzalez et al

Case Number: 8:22-cv-02325-CJC-JDE

Filer: Jorge Gonzalez

Document Number: 30

Docket Text:

WAIVER OF SERVICE Returned Executed filed by Defendant Jorge Gonzalez. Waiver of Service signed by Eran S. Forster. (Forster, Eran)

8:22-cv-02325-CJC-JDE Notice has been electronically mailed to:

Alison J. Shilling ashilling@maynardcooper.com, Lborys@maynardcooper.com, pbronstrup@maynardcooper.com

Aparajito Sen jsen@fwhb.com, rbaptist@fwhb.com

Doris Y Youmara dyy@manningllp.com

Eran Scott Forster eforster@fwhb.com

Jeffrey M Lenkov jeffrey.lenkov@manningkass.com, jml@manningllp.com, jsl@manningllp.com, tlp@ManningKass.com

Vivian I. Orlando VOrlando@maynardnexsen.com, Lborys@maynardcooper.com, pbronstrup@maynardcooper.com, vivian-orlando-2377@ecf.pacerpro.com

8:22-cv-02325-CJC-JDE Notice has been delivered by First Class U. S. Mail or by other means BY THE FILER to :

John W. Sigler
13129 Stern Avenue
La Mirada, CA 90638

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:C:\fakepath\CV-108.pdf

Electronic document Stamp:

[STAMP cacdStamp_ID=1020290914 [Date=4/23/2023] [FileNumber=35721873-0] [1634b9dbf02c1e0ac24b4d3e183a90e2bd89ed7a88ccb9da88abfc2f07711c0d47f 531f3e195de695d75bb5dd229e084dc1fc72870e611750d04e2018de63ef0]]

EXHIBIT G

Fraudulent Waiver of Service of Summons filed by Defendant's attorney Eran Forster which even contained dates falsified to deceive the Court.

FORD, WALKER, HAGGERTY & BEHAR
One World Trade Center, 27th Floor
Long Beach, California 90831-2700

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

John W. Sigler PLAINTIFF(S) JORGE GONZALEZ; USAA CASUALTY INSURANCE COMPANY; INTERINSURANCE EXCHANGE OF THE AUTOMOBILE CLUB OF SOUTHERN CALIFORNIA; IMPERIAL BODY SHOP, INC.; and DOES 1 to 99, inclusive. DEFENDANT(S).	CASE NUMBER 8:22-cv-2325-CJC-JDE WAIVER OF SERVICE OF SUMMONS
---	--

To: JOHN W. SIGLER

(Name of Plaintiff's Attorney or Unrepresented Plaintiff)

I hereby acknowledge receipt of your request that I waive service of a summons in the above-entitled action. I have also received a copy of the complaint in the action, two copies of this waiver form, and a means by which I can return the signed waiver to you without cost to me.

I agree to save the cost of service of a summons and an additional copy of the complaint in this lawsuit by not requiring that I (or the entity on whose behalf I am acting) be served with judicial process in the manner provided by Rule 4 of the Federal Rules of Civil Procedure.

I (or the entity on whose behalf I am acting) will retain all defenses or objections to the lawsuit or to the jurisdiction or venue of the court except for objections based on a defect in the summons or in the service of the summons.

I understand that judgment may be entered against me (or the party on whose behalf I am acting) if an answer or motion under Rule 12 is not served within 60 days after* March 22, 2023, or within 90 days after that date if the request was sent outside the United States.

*Date Notice of Lawsuit and Request for Waiver of Service Summons is sent.

March 22, 2023

Date Signed by Receiving Party

Eran S. Forster

Name

One World Trade Center, 27th Floor

Street Address

Long Beach, California 90831-2700

City, State, Zip Code

Signature



(562) 983-2500 | Fax: (562) 983-2555

Telephone Number and Fax Number

Attorney

Relationship to Entity on Whose Behalf I am Acting

JORGE GONZALEZ

Name of Party Waiving Service

Duty to Avoid Unnecessary Costs of Service of Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain parties to cooperate in saving unnecessary costs of service of the summons and complaint. A defendant located in the United States who, after being notified of an action and asked by a plaintiff located in the United States to waive service of a summons, fails to do so will be required to bear the cost of such service unless good cause be shown for its failure to sign and return the waiver.

It is not good cause for a failure to waive service that a party believes that the complaint is unfounded, or that the action has been brought in an improper place or in a court that lacks jurisdiction over the subject matter of the action or over its person or property. A party who waives service of the summons retains all defenses and objections (except any relating to the summons or to the service of the summons), and may later object to the jurisdiction of the court or to the place where the action has been brought.

A defendant who waives service must within the time specified on the waiver form serve on the plaintiff's attorney (or unrepresented plaintiff) a response to the complaint and must also file a signed copy of the response with the court. If the answer or motion is not served within this time, a default judgment may be taken against that defendant. By waiving service, a defendant is allowed more time to answer than if the summons had been actually served when the request for waiver of summons was received.

CERTIFICATE OF SERVICE

John W. Sigler v. Jorge Gonzalez, USAA Casualty Insurance Company, et al.

Case No. 8:22-cv-02325-CJC-JDE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am a citizen of the United States and reside at 13129 Stern Avenue, La Mirada, CA 90638. I am over the age of 18 and not a party to the within actions.

On April 27, 2023, I served the document(s) entitled,

- ## 1. Declaration in Support of Request for Entry of Default

on the interested parties in this action by placing true copies thereof enclosed in a sealed envelope addressed (see attached Service List) as stated below:

(BYMAIL): I deposited such envelope in the mail at La Mirada Post Office, California with postage fully prepaid. I am familiar with the practice of collection and processing correspondence for mailing. Under that practice, it would be placed for mailing, and deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at La Mirada, California, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the United States that the above is true and correct and was executed on April 27, 2023.


AnhThu Nguyen

1
2 **SERVICE LIST**
3

4 **John W. Sigler v. Jorge Gonzalez, USAA Casualty Insurance Company, et al.**
5

6
7 **Case No. 8:22-cv-02325-CJC-JDE**
8

9 Vivian I. Orlando (SBN 213833)
10 MAYNARD COOPER & GALE LLP
11 10100 Santa Monica Boulevard, Suite 550
12 Los Angeles, CA 90067

13 Attorney for Defendant USAA Casualty Insurance Co.
14

15 Aparajito Sen, Esq.,
16 FORD, WALKER, HAGGERTY & BEHAR
17 One World Trade Center, 27th Floor
18 Long Beach, CA 90831-2700
19 Attorney for Defendant Interinsurance Exchange of the Automobile Club
20 (sued herein as Interinsurance Exchange of the Automobile Club of Southern
21 California)

22 Jeffery Lenkov
23 MANNING & KASS
24 ELLROD, RAMIREZ, TRESTER LLP
25 801 S. Figueroa St, 15th Floor
26 Los Angeles, CA 90017-3012
27 Attorney for Defendant Imperial Body Shop

28 Jorge Gonzalez -Defendant
29 c/o FORD, WALKER, HAGGERTY & BEHAR
30 One World Trade Center, 27th Floor
31 Long Beach, CA 90831-2700
32 Attorney for Defendant Jorge Gonzalez